

## **REMARKS/ARGUMENTS**

This Amendment is responsive to the Office Action mailed on February 3, 2009. In this Amendment, claims 1, 21, 34, 44, 51, 61, 68 and 69 are amended, no claims are added, and no claims are canceled, so that claims 1-9, 11, 13-27, 29-39, 41-47, 49-56, 58-64 and 66-69 are pending and subject to examination. Support for the amended claims can be found in the Application as originally filed. No new matter has been added.

### **I. Rejection under 35 U.S.C. §103**

Claims 1-9, 11, 13-27, 29-39, 41-47, 49-56, 58-64 and 66-69 are rejected under 35 U.S.C. §103(a) as being obvious over *Chiu* (US 7,051,271) in view of *Hull* [Document image similarity and equivalence protection] and *Bozdagi* (US 6,647,535). This rejection is traversed.

Applicants respectfully submit that these references do not teach or suggest each element of these claims. For example, Applicants' claim 1 as amended recites a method in a computer system for creating a composite electronic representation including presentation material information, the method comprising:

- scanning a paper document to generate an electronic representation of the document, the document including presentation material;
- extracting a visual feature from the electronic representation of the document, the visual feature corresponding to at least a portion of the presentation material;
- accessing recorded information including at least one of audio and visual information recorded during a presentation of the presentation material, whereby at least a portion of the recorded information matches a feature portion of the presentation material, and comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion;
- generating a user selectable object providing a user with access to the portion of the recorded information determined to match the visual feature, and inserting the user selectable object into the electronic representation of the document when the computer system locates a portion of the recorded information determined to match the visual feature, the computer system thus creating a composite electronic representation of the document including the user selectable object and metadata including the matching information, the user selectable object being placed in a position associated with the extracted feature and allowing the user to access the portion of the recorded information using an embedded video link in the user selectable object by selecting the

user selectable object, the user-selectable object being able to access the portion of the recorded information using the metadata in the composite document; and  
storing the composite electronic representation as a PDF, HyperText Transfer Language (HTML), Flash or Word formatted document for access by the user or another user accessing the composite electronic document (*emphasis added*).

Such limitations are neither taught nor suggested by the cited references.

For example, as discussed of record, *Chiu* teaches a system for generating links between a scanned document and a segment of video matching the scanned document (col. 2, lines 15-17; abstract). Coefficients of an image of the document and coefficients of representative video frames are compared, and when the coefficients match within a predetermined threshold the document is linked or indexed to the video frame (col. 6, lines 5-45). As recognized in the Office Action, *Chui* does not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information corresponding to the visual feature, whereby at least a portion of the recorded information corresponds to a feature portion of the presentation material" (Office Action, p. 7). As such, *Chui* cannot render these claims obvious.

To make up for some of the deficiencies in *Chui*, *Hull* is cited as teaching comparing two images to determine their visual similarity and whether they are equivalent (Office Action p. 8). Even assuming, *arguendo*, such teaching and a motivation to combine, such a combination still would not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion" as recited in Applicants' independent claim 1 as previously presented.

Further, as discussed of record, the Office Action recognizes that a combination of *Chui* and *Hull* still would not teach or suggest "generating a user selectable object providing a user with access to the portion of the recorded information corresponding to the visual feature, and inserting the user selectable object into the electronic representation of the document when the computer system locates a portion of the recorded information corresponding to the visual

feature" (Office Action p. 10). As such, a combination of *Chui* and *Hull* would not render obvious Applicants' independent claim 1.

To make up for some of the deficiencies in *Chui* and *Hull*, *Bozdagi* is cited as teaching storyboarding in real time and near-real time using a GUI that allows a user to visually interact with an input video signal to determine the key or representative frames, or to retrieve video segments associated with already determined key frames, and a compilation of representative images can be generated (Office Action pp. 10-11).

Similar to *Chui* and *Hull* as discussed above, *Bozdagi* does not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion" as recited in Applicants' independent claim 1. Further, *Bozdagi* does not teach or suggest, either individually or in combination with *Chui* and *Hull*, "computer system thus creating a composite electronic representation of the document including the user selectable object and metadata including the matching information" where the user-selectable object is able to access the portion of the recorded information as an embedded video link in the user selectable object " as recited in Applicants' currently amended claim 1.

A primary aim of *Bozdagi* is to represent images and corresponding contents of a conversation in a story in data, where the image and contents correspond to a pair and one image corresponds to one set of conversation data. Applicants' claim 1, however, is able to use a matching algorithm to match a visual feature to a portion of any recorded information that matches the visual feature, and can generate metadata to be stored in the composite document that provides access to the matching portion(s). Even assuming, *arguendo*, there were a motivation to combine *Bozdagi* with *Chui* and *Hull*, the resulting combination would not teach or suggest such limitations, or provide such functionality. Accordingly, these references cannot render obvious Applicants' claim 1 or the claims that depend therefrom. All other claims recite limitations that similarly are not taught or suggested by these references for reasons including at least some of those set forth above.

Applicants respectfully maintain that *Chiu, Hull* and *Bozdagi* do not teach or suggest all the limitations of independent claims 1, 21, 34, 44, 51, 61, 68 and 69 as previously presented and discussed above. However, to expedite prosecution, all independent claims are amended to recite “an embedded video link in the user selectable object” and “storing the composite electronic representation as a PDF, HyperText Transfer Language (HTML), Flash or Word formatted document for access by the user or another user accessing the composite electronic document.” None of *Chiu, Hull or Bozdagi*, alone or in combination, teaches or suggests such limitations of the independent claims.

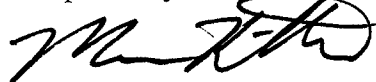
For at least these reasons, independent claims 1, 21, 34, 44, 51, 61, 68 and 69, and all claims dependent thereon, should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



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